

LEWIS & HARRISON

Consultants in Government Affairs

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December 15, 2005

Marshall Swindell, Product Manager (33)
Regulatory Management Branch No. 1
Antimicrobials Division (7510C)
Office of Pesticide Programs
Environmental Protection Agency
1801 South Bell Street
Arlington, VA 22202

re: **Registration Application for a New End-Use Product**
Product: Tolcide PS50A
EPA File Symbol: 4564-
Registrant: Rhodia, Inc.
PRIA Category A53, New Product, Me-Too, Fast Track

Dear Mr. Swindell:

On behalf of Rhodia Inc., I am submitting a registration application for **Tolcide PS50A**, a new-use product. Tolcide PS50A is essentially [REDACTED]. In addition, the use-sites on the Tolcide PS50A label are the same as those on the [REDACTED] for products containing Tetrakis (hydroxymethyl) phosphonium sulfate (THPS) as the active ingredient. Accordingly, Rhodia believes that this registration application should be placed in PRIA Category A53.

In support of this application, please find enclosed the following documents:

- 1) Application for Pesticide Registration form.
- 2) One (1) copy of the Confidential Statement of Formula (CSF) form.
- 3) Formulator's Exemption form.
- 4) Five (5) copies of the proposed product label;
- 5) Certification with Respect to Data Compensation form.
- 6) Product Specific Data Matrix Chart.
- 7) Three (3) copies of the Summary of the Physical/Chemical Properties worksheet.
- 8) Three (3) copies of the Product Chemistry data volumes.

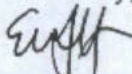
Only product chemistry data is being submitted with this application. To satisfy the acute toxicology data requirements for Tolcide PS50A, Rhodia wishes to rely on the acute toxicology studies previously submitted on Tolcide PS75. The referenced studies are noted in the document entitled "Discussion of Toxicology Data Requirements for Tolcide PS50A". In this regard, please note that the "First Aid" and "Precautionary Statements" on the Tolcide PS50A label parallel those on the Tolcide PS75 label.

Please note that this registration application does not involve any "public health" claims. Consequently, no efficacy data is being submitted.

Lewis & Harrison is acting on behalf of Rhodia as both the "Company Agent" and "Contact Point". Accordingly, please relay all questions and correspondence, including notification of the MRID numbers and Data Evaluation Records, directly to us.

If you have any questions about the enclosed submission, please contact Eliot Harrison at 202-393-3903.

Sincerely,



Eliot Harrison
Agent for Rhodia, Inc.

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re: **Registration Application for a New End-Use Product**
Product: Tolcide PS50A
EPA File Symbol: 4564-
Registrant: Rhodia, Inc.
Data Transmittal Letter for Studies Supporting the Registration
Application of Tolcide PS50A

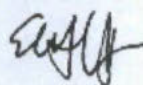
Dear Mr. Swindell:

On behalf of Rhodia Inc., I am submitting three (3) copies of the following studies in support of the Section 3 registration application for Tolcide PS50A:

- Volume 1 of 2
Product Identity, Composition and Analysis for Tolcide PS50A
MRID# **46718401**
- Volume 2 of 2
Physical and Chemical Characteristics of Tolcide PS50A:
Oxidation/reduction, pH, Viscosity and Related Density
MRID# **46718402**

If you have any questions about this submission, please contact me at (202) 393-3903, ext. 14.

Sincerely,



Eliot Harrison
Agent for Rhodia, Inc.